

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
Milwaukee Division**

GARDNER DENVER, INC.,)
Plaintiff,)
v.)
AIR PACIFIC COMPRESSORS, INC.,) Case No: 2:20-CV-00895
Defendant.)
)

**DEFENDANT'S NOTICE OF MOTION AND MOTION FOR SANCTIONS
FOR FAILURE TO COMPLY WITH A COURT ORDER**

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Attorneys for Defendant Air Pacific Compressors, Inc.

Defendant Air Pacific Compressors, Inc. (“APC”), by and through its undersigned counsel, and pursuant to Federal Rule of Civil Procedure 37, hereby moves this Court for sanctions against Plaintiff Gardner Denver, Inc. in the form of an order (i) precluding GDN from offering any evidence or testimony to support its claim for damages, (ii) precluding GDN from providing its expert any evidence of damages, and (iii) awarding APC the attorneys’ fees incurred to bring this issue to the Court. The bases for APC’s motion are set forth in APC’s Memorandum of Points and Authorities, Declaration of James M. Mulcahy, Separate Statement, and the Request for Judicial Notice filed concurrently with this motion and all other papers on file with the Court.

Dated: March 18, 2022

Respectfully Submitted,

By: /s/ Filemon Carrillo

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